

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JOUREY NEWELL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

JR CAPITAL, LLC,

Defendant.

Case No. 2:25-cv-01419-GAM

**DEFENDANT'S MOTION TO DISMISS COUNT II OF PLAINTIFF'S FIRST
AMENDED CLASS ACTION COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant, JR Capital, LLC ("JR Capital"), moves to dismiss Count II of Plaintiff's First Amended Class Action Complaint. JR Capital contemptuously files its brief in support of this motion.

Dated: April 21, 2025

Respectfully submitted,

/s/ Scott J. Helfand

Scott J. Helfand (Pro Hac Vice)

HUSCH BLACKWELL LLP

120 South Riverside Plaza

Suite 2200

Chicago, IL 60606

Scott.Helfand@huschblackwell.com

Tel: 312-341-9876

Fax: 312-655-1501

Laura K. Conroy

PA State Bar No. 206797

HUSCH BLACKWELL LLP

1801 Pennsylvania Avenue, NW

Suite 1000

Washington, D.C. 20006-3606

Laura.Conroy@huschblackwell.com

Tel: 202-378-5388

Fax: 202-378-2319

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically upon counsel of record by the filing of said document through the Court's electronic filing system on this 21st day of April 2025.

By: /s/ Scott J. Helfand
Scott J. Helfand